

Exhibit “A”

From: Mark Lott <mlott@albmlaw.com>
Sent: Tuesday, November 8, 2016 4:51 PM
To: Daniel Lockwood; Christopher, Alissa K.
Cc: Robert Anderson; Denny Barre; Angela Hillenburg; Jo Beth Combs; Liz Vesely; Angela Sanchez; CBVS Scheduling; tbarrera@l-llp.com; nvasquez@l-llp.com
Subject: Yaklin v American Road, et al - Notices of Deposition
Attachments: YALLIN AM RD NOD UUIC CORP REP.pdf; YAKLIN AM RD NOD WARD.pdf; YAKLIN AM RD AM RD CORP REP.pdf; YAKLIN AM RD NOD PULLEY.pdf

Counsel, et al:

Attached are notices of deposition for Malcolm Pulley, the American Road Corporate Representative, Jennifer Ward, and the Universal Underwriters Insurance Company Corporate Representative.

Thank you,

Mark

MARK LOTT
PARALEGAL ASSISTING ROBERT ANDERSON
Anderson, Lehrman, Barre & Maraist, LLP
Corpus Christi, Texas
361 884 4981
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*****Email Confidentiality Notice*****

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UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
CORPUS CHRISTI DIVISION

EDDIE YAKLIN FORD LINCOLN MERCURY §
NISSAN, INC. §

VS. §

CIVIL ACTION NO. 2:15-CV-399

AMERICAN ROAD INSURANCE COMPANY §
AMERICAN ROAD SERVICES COMPANY, §
and UNIVERSAL UNDERWRITERS §
INSURANCE COMPANY §

PLAINTIFF'S NOTICE OF ORAL/VIDEO DEPOSITION OF JENNIFER WARD

To: Defendant, Universal Underwriters Insurance Company, by and through their attorney of record, Alissa K. Christopher, Cozen O'Connor, 1717 Main Street, Suite 3400, Dallas, Texas 75201-7335

Please note that Plaintiff, Eddie Yaklin Ford Lincoln Mercury Nissan, Inc., will take the oral / video deposition of Jennifer Ward.

The deposition will begin at **9:00 a.m. on November 16 , 2016**. The deposition will take place at the offices of **Cozen O'Connor, 1717 Main Street, Suite 3400, Dallas, Texas 75201**.

Said deposition will be taken before a court reporter from DepoTexas - CC or any other notary public or officer authorized to administer oaths. You are invited to attend and examine the witness.

This deposition may be recorded or videotaped in addition to the usual stenographic recording.

Respectfully Submitted,

**ANDERSON, LEHRMAN, BARRE
& MARAIST, LLP**

1001 Third Street, Suite 1
Corpus Christi, Texas 78404
(361) 884-4981
(361) 884-9618 (fax)
Email: randerson@albmlaw.com
Email: dbarre@albmlaw.com

By: /s/ Robert Anderson

ROBERT ANDERSON

State Bar No. 01220800

Federal ID No. 5896

DENNY BARRE

State Bar No. 01805280

Federal ID No. 13121

**ATTORNEYS FOR YAKLIN FORD
LINCOLN MERCURY NISSAN, INC.**

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document has been served in accordance with the Federal Rules of Civil Procedure to the following on the 8th day of November, 2016.

Daniel Lockwood
LANGLEY, LLP
901 Main Street, Suite 600
Dallas, Texas 75202

Email: dlockwood@l-llp.com

Alissa K. Christopher
Cozen O'Connor
1717 Main Street, Suite 3400
Dallas, Texas 75201-7335

Email: akchristopher@cozen.com

DepoTexas - CC

Email: liz@depotexas.com
and angela@depotexas.com

Coastal Bend Video Services

Email: joe@coastalbendvideo.com

/s/ Robert Anderson

Robert Anderson

UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
CORPUS CHRISTI DIVISION

EDDIE YAKLIN FORD LINCOLN MERCURY
NISSAN, INC.

VS.

AMERICAN ROAD INSURANCE COMPANY
AMERICAN ROAD SERVICES COMPANY,
and UNIVERSAL UNDERWRITERS
INSURANCE COMPANY

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CIVIL ACTION NO. 2:15-CV-399

**PLAINTIFF'S NOTICE OF ORAL/VIDEO DEPOSITION OF DEFENDANT
UNIVERSAL UNDERWRITERS INSURANCE COMPANY'S CORPORATE
REPRESENTATIVE**

To: Defendant, Universal Underwriters Insurance Company, by and through their attorney of record, Alissa K. Christopher, Cozen O'Connor, 1717 Main Street, Suite 3400, Dallas, Texas 75201-7335

Please note that Plaintiff, Eddie Yaklin Ford Lincoln Mercury Nissan, Inc., will take the oral / video deposition of the **CORPORATE REPRESENTATIVE for UNIVERSAL**

UNDERWRITERS INSURANCE COMPANY on the following topics:

1. The specifics of the claim made the basis of this lawsuit, the adjustment and investigation of the claim, and the claim process and the information and documents involved therein.
2. Communications between the parties herein, including but not limited to communications with respect to the claimed loss.
3. The basis of the denial of the claim made the basis of this lawsuit.
4. The purchase of the insurance policy involved herein.
5. Documents and information relevant to the denial of the claim.
6. The policy of insurance involved herein and the provisions thereof relied upon to deny the claim.
7. Defendant's underwriting procedures and processes.
8. The making and issuing of contracts of insurance and compliance with procedures

in connection with the purchasing of this insurance policy.

9. The qualifications and training of Defendant's claims representatives involved in this claim.

The deposition will begin at **1:30 p.m. on November 16 , 2016**. The deposition will take place at the offices of **Cozen O'Connor, 1717 Main Street, Suite 3400, Dallas, Texas 75201**.

Said deposition will be taken before a court reporter from DepoTexas - CC or any other notary public or officer authorized to administer oaths. You are invited to attend and examine the witness.

This deposition may be recorded or videotaped in addition to the usual stenographic recording.

Respectfully Submitted,

**ANDERSON, LEHRMAN, BARRE
& MARAIST, LLP**

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Email: *randerson@albmlaw.com*
Email: *dbarre@albmlaw.com*

By: */s/ Robert Anderson*

ROBERT ANDERSON

State Bar No. 01220800

Federal ID No. 5896

DENNY BARRE

State Bar No. 01805280

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ATTORNEYS FOR YAKLIN FORD

LINCOLN MERCURY NISSAN, INC.

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Daniel Lockwood
LANGLEY, LLP
901 Main Street, Suite 600
Dallas, Texas 75202

Email: dlockwood@l-llp.com

Alissa K. Christopher
Cozen O'Connor
1717 Main Street, Suite 3400
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DepoTexas - CC

Email: liz@depotexas.com
and angela@depotexas.com

Coastal Bend Video Services

Email: joe@coastalbendvideo.com

/s/ Robert Anderson

Robert Anderson